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**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RAYMOND SKELTON,)
v.) Civil Action No. 1:19-cv-18597-RMB-SAK
)
)
)
Plaintiff,)
) **DOCUMENT FILED**
) **ELECTRONICALLY**
)
)
NEW JERSEY DEPARTMENT)
OF CORRECTIONS, et al.,)
)
Defendants.)

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE AMENDED COMPLAINT NAMING DOE DEFENDANTS**

NOW COMES Plaintiff, Raymond Skelton, by and through his counsel, Keith Altman, and files his Motion for Extension of Time to File Amended Complaint Naming DOE Defendants, and hereby states the following:

Plaintiff commenced this action on October 2, 2019. (ECF 1). On March 3rd, 2020, Defendants filed a Motion to Dismiss. (ECF 14). On October 30th, 2020, This Honorable Court partially granted Defendant's Motion to dismiss, resulting in the

dismissal of NJDOC as a Defendant. (ECF 22). On July 20th, 2021, this Honorable Court directed Plaintiff to file a motion to amend the complaint. (ECF 27).

On August 11, 2022, the Court issued an Order requiring Plaintiff to designate DOE Defendants by October 10, 2022. (ECF 37).

The parties have been working diligently to coordinate the deposition of an individual, to be designated by Defendants, with the knowledge of the DOE Defendants identities.

Defendant has identified a person with knowledge of the identities of the DOE Defendants.

The earliest agreeable date to which the deposition is to be noticed is November 22, 2022.

Plaintiff will be unable to identity DOE Defendants until the deposition on November 22, 2022, has been completed.

For this reason, the Parties request that the Court grant an extension of time to December 15, 2022, for Plaintiff to identify DOE Defendants.

This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

Counsel for the parties have met regarding the present motion. Defendants are agreeable to an extension of time imposed by the Court for Plaintiff's to identify DOE Defendants.

CONCLUSION

WHEREFORE, Plaintiff respectfully requests that this Court grant the forgoing motion.

Date: September 29, 2022

Respectfully Submitted,

/s/Keith Altman

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2022, I served the foregoing document upon all parties by filing this document on this court's CM/ECF electronic filing system which will send a true copy to all counsel of record.

/s/ Solomon M. Radner

Attorney for Plaintiffs and the Class